

IOLANI MENZA; June 27, 2019

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1  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE WESTERN DISTRICT OF WASHINGTON  
4 AT SEATTLE

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THE STATE OF WASHINGTON, )  
Plaintiff, )  
vs. ) No. 3:17-cv-05806-RJB  
THE GEO GROUP, INC., ) SOME OF THE EXHIBITS AND  
Defendant. ) TESTIMONY HAVE BEEN  
 ) DESIGNATED AS  
 ) CONFIDENTIAL  
)

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DEPOSITION UPON ORAL EXAMINATION

OF

IOLANI MENZA

9:54 a.m.  
June 27, 2019

1250 Pacific Avenue 105  
Tacoma, Washington 98401-2317



REPORTED BY: JACQUELINE L. BELLows, CCR 2297



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1 APPEARANCES

2 For the Plaintiff:

3 MARSHA CHIEN  
4 OFFICE OF THE ATTORNEY GENERAL  
5 800 Fifth Avenue 2000  
6 Seattle, Washington 98164-1338  
7 206.464.7744  
8 marsha.chien@atg.wa.gov

9 For the Defendant:

10 KRISTIN ASAII  
11 Holland & Knight  
12 111 SW 5th Avenue Suite 2300  
13 Portland, Oregon, United States 97204.  
14 503.517.2948  
15 Kristin.Asai@hklaw.com

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5

2 9:54 a.m.

3 | ---oo---

4

5 IOLANI MENZA,

6 sworn as a witness by the certified court reporter,

7 | testified as follows:

8

9 | EXAMINATION

10 BY MS. CHIEN:

11 Q. Can you say your name for the record?

12 A. Iolani Menza.

13 Q. Iolani Menza, that will help me be able to  
14 pronounce it correctly. My name is Marsha Chien. I  
15 represent the State of Washington. And we're about to  
16 take your deposition. And is there anything that would  
17 cause you concern that you wouldn't be able to my  
18 questions accurately?

19 A. NO.

20 Q. Have you had your deposition taken before?

21           A.    I was in court once.  I've never been in a  
22 room like this.

23 Q. With a court reporter or anything like that?

24 You've never been in a room with a court reporter --

25 A. No.



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1 A. Unless they didn't want to come down.

2 Q. What about the barbers? Are those detainees?

3 A. Yeah.

4 Q. So detainee workers are the barbers that cut

5 other detainees' hair; is that right?

6 A. Yeah.

7 Q. How many barbers are there?

8 A. It just depended.

9 Q. How many were assigned on a given day?

10 A. I couldn't tell you exactly. It's just

11 usually who showed up.

12 Q. Did you have a list of potential barbers,  
13 barbers who are detainees, who might show up?

14 A. Yes.

15 Q. Who gave you that list?

16 A. Nobody gave me. It was there.

17 Q. Do you know which department was responsible  
18 for making sure that --

19 A. Classification should be responsible for all  
20 the detainees' jobs.

21 Q. Were there times when there were -- were there

22 times when there weren't enough barbers for the number

23 of detainees who needed haircuts?

24 A. Repeat the question.

25 Q. Were there times when there weren't enough



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1       barbers, given the number of detainees who needed  
2       haircuts?

3       A.    So the -- I don't understand 'cause I've never  
4       not gotten everybody who wanted a haircut done.

5       Q.    So they might just have to wait in line if  
6       there's only one detainee barber?

7       A.    Yeah.

8       Q.    What happens if you have your list of detainee  
9       barbers and they've all been booked out? How do -- you  
10      what happens then?

11      A.    Volunteers, ask for volunteers to cut hair.

12      Q.    Who asks? How do you replace that list?

13            MS. ASAII: Object to the form.

14      A.    I've never replaced the list.

15      Q      (By Ms. Chien) Let me back up. So if you  
16      have, like, a list of -- I'm going to say five detainee  
17      barbers.

18      A.    Okay.

19      Q.    And you had testified that, you know,  
20      detainees, whoever comes down, will be the barber for  
21      that day, right, of that list of five; is that right?

22      A.    (Nodding.)

23      Q.    Let's say nobody comes down for, like, three  
24      days. No detainee barber comes down. How do you get  
25      more detainee barbers?



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1 Q. Is it also three to four detainees?

2 A. I don't know.

3 Q. Did you ask for three to four detainee  
4 workers? Or was that assigned to you?

5 A. I . . .

6 MS. ASAII: Object to the form.

7 A. I didn't ask for anything specific. So just,  
8 if they were allowed to come, they would come. You know  
9 what I mean? I didn't ask for any number of detainees  
10 to come or anything like that.

11 Q (By Ms. Chien) Let me back up actually. So  
12 there's detainee workers that work in the laundry; is  
13 that right?

14 A. Yes.

15 Q. Who was allowed to work in the laundry as a  
16 detainee? Were you provided a list?

17 A. Yes.

18 Q. How many detainees are on that list for a  
19 given shift?

20 A. So without seeing the list, I don't know  
21 exactly how many. We -- I generally have four detainees  
22 that I would call down.

23 Q. When your shift started, would you have to  
24 call the pod and ask for those four detainees?

25 A. Not normally, no.



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1 Q. How does it normally work?

2 A. They are day-shift workers. So they would  
3 come down 'cause they knew they would come down. I knew  
4 they would come down and help out with the laundry. And  
5 if they didn't come down, I would call the pod and see  
6 why they didn't come down. And so, if they just didn't  
7 feel like coming that day, that was fine. And then I  
8 might call an alternate. But normally three is fine.

9 Q. Okay. Could you work with no detainee  
10 workers? Could you do it all without any detainee  
11 workers?

12 MS. ASAII: Object to the form.

13 A. I can work 'cause it was my job, yeah.

14 Q (By Ms. Chien) You had mentioned that you  
15 would complete laundry for a pod in one day, in one  
16 shift; is that right?

17 A. Yes.

18 Q. Could you do that if you were the only person  
19 working in the laundry?

20 A. I don't know. I've never done it by myself.

21 Q. What was the least amount of detainee workers  
22 that you've had in the laundry for a shift?

23 A. One.

24 Q. How did the work change when you had only one  
25 detainee worker as opposed to three?



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1 A. Yeah.

2 Q. But then there were also new detainee workers  
3 that came on while you were laundry officer; is that  
4 right?

5 A. Yes.

6 Q. How did you get those new detainee workers?

7 A. I had a list of individuals that were on the  
8 standby waiting list. I called their officer at the pod  
9 they stayed in and had their officer ask them if they  
10 would like to work with me in the laundry room. They  
11 either said yes or no.

12 Q. Did you ever get to choose which detainee  
13 workers you would prefer to work in the laundry?

14 A. The process is the way I called for workers.  
15 I never chose.

16 Q. Did you have any preferences? Like if you  
17 could choose, were there some detainee workers that were  
18 better than others?

19 A. I would just go by the list. So . . .

20 Q. I mean about their work product, how they  
21 worked. They all worked the same?

22 A. No. They -- everybody has different  
23 personalities. Everybody is different. As long as they  
24 got the job done, that's fine with me.

25 Q. Did you ever have to call classification to



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1 the list of emails. Do you see that?

2 A. So what was the question?

3 Q. I just wanted to get you to that spot on the

4 page. It says: "The laundry officers do the hiring."

5 Do you see that?

6 A. I see it says that in this email.

7 Q. Do you think that's accurate?

8 A. So its his interpretation of hiring is not  
9 mine. Mine is I go off the list based on what I'm  
10 provided. So I'm given a list. That's who's next.

11 Q. Later it says: "Day shift received approval  
12 to hire ML and MH detainees only." What does that mean?  
13 Do you know, "ML and MH detainees"?

14 A. I do.

15 MS. ASAII: Object to the form.

16 Q (By Ms. Chien) What does it mean?

17 A. So ML is a classification, and MH is a  
18 classification.

19 Q. Got it. Have you ever heard of the term  
20 "OSHA"?

21 A. Yes.

22 Q. What does it mean to you?

23 A. Government safety . . .

24 Q. Is it about workplace safety?

25 A. (Shrugs.) Govern the safety.



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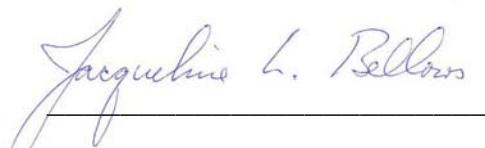
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## 1 REPORTER'S CERTIFICATE

2 I, JACQUELINE L. BELLWS, the undersigned  
3 Certified Court Reporter pursuant to RCW 5.28.010 authorized  
4 to administer oaths and affirmations in and for the State of  
5 Washington, do hereby certify that the sworn testimony  
6 and/or proceedings, a transcript of which is attached, was  
7 given before me at the time and place stated therein; that  
8 any and/or all witness(es) were duly sworn to testify to the  
9 truth; that the sworn testimony and/or proceedings were by  
10 me stenographically recorded and transcribed under my  
11 supervision, to the best of my ability; that the foregoing  
12 transcript contains a full, true, and accurate record of all  
13 the sworn testimony and/or proceedings given and occurring  
14 at the time and place stated in the transcript; that a  
15 review of which was requested; that I am in no way related  
16 to any party to the matter, nor to any counsel, nor do I  
17 have any financial interest in the event of the cause.

18 WITNESS MY HAND AND DIGITAL SIGNATURE this 1st  
19 day of July, 2019.

20

21   
22

23 Jacqueline L. Bellows  
24 Washington State Certified Court Reporter, No. 2297  
25 jbellows@yomreporting.com



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